

January 30, 2001

Docket Management Section
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room PL-401
Washington, DC 20590

**RE: Docket No. NHTSA-00-8296 – Request for Comments
 - Certification; Federal Motor Vehicle Safety Standards;
 Tire Identification and Recordkeeping; Consumer Information Regulations
 [Federal Register, Vol. 65, No. 232, December 1, 2000, 75222]**

The Tread Rubber and Tire Repair Materials Manufacturers' Group (TRMG) is a non-profit corporation established over thirty (30) years ago in order to foster the advancement of the tire retreading and repair industries in the United States through the cooperative efforts of TRMG and the nation's retreaders and tire repairers, while safeguarding the interest of the public therein. Its membership is comprised of twelve (12) companies whose business includes the manufacturing of tread rubber and/or tire repair materials for resale to a majority of tire retreaders and/or tire repairers in every state. A copy of the TRMG Membership Roster is attached for your information.

The Members of TRMG particularly appreciate the opportunity extended to them to submit comments in response to the above referenced Docket Number. Listed below is the response of TRMG to Request for Comment question twenty-four (24) within that Docket, which is as follows:

- (24) What changes, if any, should be made in the labeling requirements applicable to retreaded tires? Please provide the basis for your response.

RESPONSE: After discussion among members of the Group, it was first concluded that the majority of retreaded tires produced from tire retread materials furnished by the Group are utilized in commercial applications.

That being the situation, most of the retreaded tire service work relating to the labeling of tires is performed by tire service personnel with a sufficient amount of training to utilize tire labeling information required under the current regulations.

With regard to retreaded passenger car tires, that market segment has been in continuous decline for a number of years and now constitutes a very small share of consumer tire purchases.

In light of the foregoing, the Group believes that the current requirements for tire labeling are sufficient and do not need to be changed.

Thank you for the opportunity to express the opinion of TRMG on this issue. Please do not hesitate to contact our organization if the Membership can be of further assistance to NHTSA.

Sincerely,

Russell R. Blair

Russell R. Blair, Chairman (2001)
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**TREAD RUBBER AND TIRE REPAIR MATERIALS
MANUFACTURERS' GROUP**

**TRMG MEMBERSHIP ROSTER
(as of January 1, 2001)**

Associated Rubber Company

Bandag, Inc.

Bandamatic Systems, Inc.

Hercules Tire & Rubber Co.

Marangoni Tread North America

Michelin Retread Technologies, Inc.

Oliver Rubber Company

Rema Tip Top/North America

Tech International

Teknor-Apex Company

Truflex-Pang

Vipal Rubber Corporation